

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-326-C

IN RE:)
Analysis of Continued Availability of)
Unbundled Local Switching for Mass Market)
Customers Pursuant to the Federal Communication)
Commission's Triennial Review Order)
)

**THIRD SET OF INTERROGATORIES AND REQUESTS TO PRODUCE OF MCI
WORLDCOM COMMUNICATIONS, INC., INTERMEDIA COMMUNICATIONS, INC.,
AND METRO ACCESS TRANSMISSION SERVICES, LLC, TO BELL SOUTH
TELECOMMUNICATIONS, INC.**

INSTRUCTIONS

1. Please answer each question separately and in the order that it is asked. The numbers of the answers should correspond to the numbers of the Interrogatories or Requests for Production of Documents being answered. Please copy each question immediately before the answer. Following each answer, please identify the person or persons responsible for the answer and indicate what person or witness provided responsive information, and where applicable, what witness will sponsor each answer in testimony.

2. In response to Requests for Production of Documents seeking the production of documents, such response shall, at a minimum, comply with the procedures established in South Carolina Public Service Commission Triennial Review Order of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers ("TRO"), and with these instructions. Please produce all responsive documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business and organize and label them to correspond to the categories in this request. If the requested documents are kept in an electronic format, you shall produce the requested document in such format. If any part of a document is responsive to any request, the whole document is to be produced. If there has been any alteration, modification or addition to a document (whether in paper form or electronic), including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists,

drafts, revisions or redlines, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

3. In response to Interrogatories requesting you to identify documents or other items, information or materials for disclosure, please identify the document(s) or other item(s), information or material(s) in sufficient detail so that they can be produced in response to a separate Request for Production. Such identification shall contain the number (and subpart, if applicable) of the Interrogatory requesting the identification and the page count or description of the document or item. Additionally, to the extent known, the listing shall include the author, publisher, title, date, and any “Bates” or other sequential production numbering for the document or item. When responding to the Requests for Production of Documents, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to “identify for disclosure” in MCI’s Interrogatories. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the “identification for disclosure”.

4. Please produce the requested information at the most granular level you possess. If an Interrogatory or Request for Production of Documents/Data Request seeks information at a level more granular than what you possess, please do not object or decline to answer or produce on that basis, but rather, state that you do not possess information at that level and produce the information requested at the most granular level that you possess. MCI is not asking for the creation of brand new data, but is seeking all available data for the specific categories and sub categories described.

5. Please produce all information requested on any table by filling in the table provided in these Interrogatories or Requests for Production of Documents. If additional explanation is required, please copy the question and provide your response below.

6. As used in these Interrogatories or Requests for Production of Documents, the singular shall also be treated as plural and vice-versa. If you are unable to respond fully and completely to an Interrogatory or Request for Production of Documents, you shall explain the reasons why you are unable to do so. The terms defined herein and the individual Interrogatories or Requests for Production of Documents should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with all applicable rules, including without limitation the S.C. Code Ann. Regs. 103-851 and Order No. 2003-667).

7. This request is directed to all documents and information in your custody or control. A document is deemed to be in your custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably available to you (including those documents or communications in the custody or control of your company’s present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents contained in these Interrogatories or Requests for Production of Documents, you shall produce the document, including all appendices, exhibits, schedules, and attachments, that is most relevant to the request.

8. If you are unable to produce a document or information based on a claim that the document is not in your custody or control, state the whereabouts of such document or information when it was last in your possession, custody or control, and provide a detailed description of the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

9. These Interrogatories or Requests for Production of Documents are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by your company, then in such case, you should change or modify such answer and submit such changes answer as a supplement to the original answer. Further, should a subsequent version(s) of a document have been created or exist as of the date of these Interrogatories or Requests for Production of Documents, such version(s) must be produced. Where prior versions or drafts of documents exist, please produce all such documents in your possession, custody or control.

10. MCI requests that you answer these Interrogatories or Requests for Production of Documents under oath or stipulate in writing that its Interrogatory or Request for Production of Documents/Data Request responses can be treated exactly as if they were filed under oath.

11. If you claim a privilege, or otherwise decline to produce or provide, any document or information responsive to one or more of the following categories, in addition to, and not in lieu of, any procedure that you must follow under law to preserve your objection(s) and/or privilege(s), within the time period after receiving these Interrogatories or Requests for Production of Documents as established in Florida Public Service Commission Order Nos. PSC 03-1054-PCO-TP and PSC-03-1200 -PCO-TP, the attorney asserting the privilege shall:

a. identify in the objection to the request for information, or sub-part thereof, detailed reasons for your claim of privilege or other basis for protecting the document or information from disclosure; and the nature of the privilege (including work product) that is being claimed; and

b. provide the following information in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:

(i) for documents (1) the type of document; (2) subject matter of the document; (3) the date of the document; (4) the number of pages in the document; (5) the location or custodian of the document; (6) such other information as is sufficient to identify the document for a subpoena duces tecum, including, where available, the names(s), address(es) and telephone number of the author(s) of the document and all recipient(s), and, where not apparent, the relationship of the author and addressee to each other;

(ii) for oral communications (1) the name(s), address(es) and phone number(s) of the person making the communication and the name(s), address(es) and phone number(s) of the persons present while the communication was made; (2) the relationship of the person(s) present to the person(s) making the communication; (3) the date and place of each communication; (4) the general subject matter of the communication.

12. In the event that any requested information is considered by you to be confidential, the attorney asserting such confidential status shall inform MCI of this designation as soon as he or she becomes aware of it, but in any event, prior to the time the responses to the Interrogatories or Requests for Production of Documents are due to discuss or negotiate a compromise. However, the confidential documents should be produced pursuant to the protective order(s) and/or non-disclosure agreement(s) executed in this proceeding.

13. Answers to these requests for information are to be provided within the time frames established in South Carolina Public Service Commission Triennial Review Order of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers (“TRO”) Order No. 2003-667, after receiving these requests. Any request for information received by you prior to 5 p.m. EST shall be deemed received on the date of service. Service of responses, and all notifications, shall be made in person or by facsimile or email to:

Kennard B. Woods
MCI
Law and Public Policy
6 Concourse Parkway, Suite 600
Atlanta, GA 30328
Phone (770) 284-5497
Fax (770) 284-5488

Darra W. Cothran
Woodward, Cothran & Herndon
Post Office Box 12399
Columbia, S. C. 29211
Phone (803) 799-9772
Fax (803) 799-3256

DEFINITIONS

1. The term “analog” refers to electrical signals representing sound or data which are transmitted in a linear, non-digital format.
2. The terms “batch cut” and “batch hot cut” refer to a process by which the incumbent LEC simultaneously migrates two or more loops from one carrier’s local circuit switch to another carrier’s local circuit switch.
3. The term “bundled service” refers to a package offering to an end user customer that includes at least two different services for a single, usually discounted price, whether flat-rate or charged on a per unit basis. An example would be the offering of local and long distance service to an end user customer for a price that is less than the standard retail charges that would be assessed for each service individually.
4. The term “business end user” refers to an end user customer entity that purchases voice or data services, typically supported on multiple loops, to support a commercial enterprise. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.

5. The acronym “CLEC” refers to competitive local exchange carriers.
6. The acronym “CLLI” refers to common language location identifier, an 11-character code generally comprised of numerals and letters that provides a unique identifier for circuit switches used by ILECs and CLECs.
7. The acronym “CO” refers to central office, the single physical ILEC building that houses one or more Class 5/end office ILEC switch(es), and in which end user customers’ loops are cross connected to ILEC switching equipment or CLEC collocation arrangements.
8. The term “communication” includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.
9. The terms “cost study,” “cost studies,” “cost model” and “cost analyses” means the detailed development of a rate element or of rate elements through a methodology based upon engineering, operational, economic, accounting, or financial inputs, plus support for the sources of the inputs or support for the derivations of the inputs, that enables a person using the study, studies, model or analyses to start with the support for each input and to then trace the support to the input, and to then be able to trace the input through the methodology to the resulting cost and then to the resulting rate element.
10. The term “cross connect” refers to an optical cable or copper cable that connects a CLEC’s collocation arrangement to the ILEC MDF.
11. The term “customer location” refers to a building or set of connected, contiguous, or adjacent buildings in a common area, used by residential, commercial, and/or governmental customers that share a primary street address or group of street addresses. It includes multi-unit residential, commercial, and/or governmental premises.
12. The term “customer premises” refers to the physical point at which the end user customer assumes responsibility for telecommunications wiring (i.e., the network interface device (“NID”) for single unit dwellings, and the individual point of demarcation at the end user customer’s unit for multi-unit buildings such as office buildings and apartment buildings).
13. The term “digital” refers to electrical or optical signals representing sound or data which are transmitted in a binary, discontinuous, non-linear format.

14. The term “document,” as used herein, shall have the same meaning and scope as contained in Rule 34 of the Federal Rules of Civil Procedure, and shall include, without limitation, all written, reported, recorded, magnetic, graphic, photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.
15. The term “DS-0” refers to a digital signal at level zero capable of transmitting at 64 kilobits per second.
16. The term “DS-0/voice grade” includes all circuits normally used for the provision of a service to transmit human voice alone. In particular, it includes analog circuits and digital circuits capable of transmitting at levels greater than 2400 baud, up to and including 64 kilobits per second.
17. The term “DS-1” refers to Digital Signal Level 1, which has a transport speed of 1.544Mbps, and can be either unchannelized or channelized into 24 voice grade channels.
18. The term “hot cut” refers to an individual coordinated simultaneous transfer of DS-0/voice grade loops with live customers’ service transferred.
19. The term “identify” or “identifying” means:
- (a) When used in reference to natural persons: (1) full name; (2) last known address and telephone number; (3) whether the person is currently employed by, associated or affiliated with SWBT; (4) that person’s current or former position; and (5) dates of employment, association or affiliation.
 - (b) When used in reference to a document: (1) its author; (2) actual or intended recipient(s); (3) date of creation; and (4) brief description of its contents.
 - (c) When used in reference to a communication: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.

20. The acronym “IDF” refers to intermediate distribution frame, a physical frame located between an MDF and an ILEC switch in a central office or wire center over which end user customer loops are transited for connection to the ILEC switch.
21. The term “ILEC” refers to incumbent local exchange carrier, and includes ILEC’s parent or any subsidiary or affiliate and all current or former officers, directors, employees, agents, representatives, contractors or consultants of ILEC, as well as any persons or other entities who have acted or purported to act on its behalf.
22. The term “LATA” means “Local Access and Transport Area” as that term is defined in the *Modification of Final Judgement, United States v. Western Elec. Co.*, 552F. Supp. 131 (D.D.C. 1982), *aff’d sub nom., Maryland v. United States*, 460 U.S. 1001 (1983).
23. The term “MSA” refers to the Metropolitan Statistical Area as defined by the US Census Bureau and the Office of Management and Budget.
24. The term “qualifying service” refers to all telecommunications services, whether voice or data, and whether analog or digital that have ever been offered or provided by an ILEC pursuant to tariff or an interconnection agreement.
25. The acronym “MDF” refers to main distribution frame, a physical frame located in a central office or wire center that connects loops coming from an end user customer premises to an ILEC switch located in the central office or wire center.
26. “Relate, mention, reference, or pertain” shall be used to mean documents or communications containing, showing, relating, mentioning, referring or pertaining in any way, directly, or indirectly to, or in legal, logical or factual way connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by such request.
27. The term “residential end user” refers to an end user customer, typically an individual or family, who purchases voice or data services at his, her or their place of residence, or household. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.
28. The term “Telcordia” refers to Telcordia Technologies, Inc. and its parent(s), current and former affiliates or subsidiaries, and all current or former officers, directors, employees, agents, representatives, contractors or consultants, as well as any persons or other entities who have acted or purported to act on its behalf.
29. The term “wire center” is synonymous with the term “central office,” and refers to the single physical building that houses one or more Class 5/end office ILEC switch(es) and

in which end user customer's loops are cross connected to the Class 5/end office ILEC switch(es).

30. The term "MCI" means MCI WorldCom Communications, Inc., Intermedia Communications, Inc., and MCImetro Access Transmission Services, LLC.
31. The terms "you," "your," "yours", or "your company" means the carrier or other business entity or proprietorship receiving these Third Set of Interrogatories and Requests to Produce, including all affiliates, subsidiaries, officers, agents, attorneys, employees, representatives, agents, and consultants.
32. Unless the context indicates otherwise, any terms not specifically defined herein shall have such meaning as is utilized by BellSouth in its prefiled testimony in this docket. In the event such term is not defined in these instructions or employed in BellSouth's testimony, then BellSouth shall utilize such meaning as is provided for in the rules or orders of the Federal Communications Commission and/or the South Carolina Public Service Commission. If none of the foregoing apply, then such term shall have the meaning commonly used by the telecommunications industry. If there is any doubt as to the meaning of a term as used herein, then please request clarification.

INTERROGATORIES

1. At pages 25, 26 and 27 of Mr. Ainsworth's direct testimony in Florida Public Service Commission Docket No 030851-TP eight methods of unbundling loops that are currently served over JDLC facilities are identified. With respect to such "alternative," please separately indicate

- a. the percent of total current unbundled loops in the Company's operating area in the state of South Carolina that have been provisioned by the indicated alternative method;
- b. whether the alternative has the potential to negatively impact modem performance;
- c. whether unbundled loops provisioned by the indicated alternative are provisioned within 5 or fewer business days from the date of the original CLEC order;
- d. if the stated alternative results in provisioning intervals greater than 5 business days, please indicate the average number of business days in which such alternative is implemented;
- e. whether the stated alternative is provisioned such that modems are able to operate at the highest possible speeds available under the V.90 protocol;

f. whether the stated unbundling alternative will necessarily limit modem speeds to V.34 — or lower — protocol.

2. With respect to Alternative 2 identified on page 26 of Mr. Ainsworth's direct testimony, please provide all documentation, engineering manuals or diagrams explaining the "grooming" process. Please separately indicate whether this alternative has the potential to necessitate additional D/A or A/D conversions or otherwise affect modem performance.

3. With respect to the re-terminate to "spare TJDLC" equipment option included in Alternative 3 described at page 26 of Mr. Ainsworth's testimony, please provide all documentation, engineering manuals or diagrams explaining the option.

4. With respect to Alternative 4 described at page 27 of Mr. Ainsworth's testimony, please provide all documentation, engineering manuals or diagrams explaining the alternative and separately indicate whether this alternative has the potential to necessitate additional AID conversions or otherwise affect modem performance.

5. With respect to Alternative 5 described at page 27 of Mr. Ainsworth's testimony, please provide all documentation, engineering manuals or diagrams explaining the alternative and separately indicate whether this alternative has the potential to necessitate additional D/A or AID conversions or otherwise affect modem performance.

6. With respect to Alternative 5 described at page 27 of Mr. Ainsworth's testimony, please describe the circumstances under which "side door/hairpin" capabilities would not be available? And, indicate the percent of IDLC systems for which "side-door/hairpin" capabilities are not available.

7. With respect to Alternative No. 6 at page 27 of Mr. Ainsworth's testimony, please provide a list of all wire centers (by CLLI) containing switch peripherals that are "not capable of side-door/hairpin functionality." For each such wire-center, please indicate in which CEA and rate zone the center resides.

8. Please indicate the average installation interval — measured in business days from receipt of a valid CLEC order — for all unbundled loops in the state of South Carolina that were provisioned under the eight enumerated alternatives described at pages 25 — 26 of Mr. Ainsworth testimony.

9. Please indicate the average installation interval — measured in business days from receipt of a valid CLEC order — for all unbundled loops in the state of South Carolina that were provisioned under the first six alternatives described at pages 25 —26 of Mr. Ainsworth testimony.

10. For each of the eight enumerated alternatives included in Mr. Ainsworth's testimony please separately indicate the percent of unbundled loop currently provided to CLECs resulted in loops with copper portions:

- a. Less than 11,999 feet;
- b. Between 12,00 and greater than 14,999 feet
- c. Between 15,000 and 17, 999 feet;

- d. Between 18,000 and 20,999 feet; and
- e. Over 21,000 feet.

11. For each month of 2002 and 2003, please separately indicate the number of CLEC to CLEC, or UNE-P to UNE-P, migrations that took place throughout the Company's service area in the state of South Carolina.

12. For each month of 2002 and 2003, please separately indicate the number of CLEC Resale lines that have been migrated, or switched to another CLEC's UNE- throughout the Company's operating area in the state of South Carolina.

13. At page 4 of his Direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates "BellSouth has run force models to forecast the additional load necessary in the centers and in network operations if BellSouth receives relief from unbundled switching." Please provide all such model input, model output and working electronic copies of such models.

14. At page 9 of his Direct testimony in Florida Public Service Commission Docket No. 03085 1-TP, Mr. Heartley indicates that the "model" includes the percent of JDLC in each central office." Please provide the percent of loops to be migrated — in aggregate — that BellSouth anticipates are currently provisioned via IDLC facilities and, therefore, must be unbundled as described by one of the enumerated IDLC unbundling alternatives in Mr. Ainsworth's Direct testimony.

15. At page 10 of his direct testimony in Florida Public Service Commission Docket No. 03085 1-TP, Mr. Heartley indicates that BellSouth may hire as many as 687 central office employees in South Carolina. Please indicate whether BellSouth may hire additional central office employees in South Carolina and, if so, how many, and whether these same employees would be involved in the provisioning of Transport to and from CELC collocation arrangements in South Carolina.

16. At page 10 of his direct testimony in Florida Public Service Commission Docket No. 03085 1-TP, Mr. Heartley indicates that BellSouth may hire as many as 687 central office employees in South Carolina. Please indicate whether BellSouth may hire additional central office employees in South Carolina and, if so, how many, and whether these same employees would be involved in the provisioning of EELs in South Carolina.

17. At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851 TP Mr. Heartley indicates that BellSouth may hire as many as 687 central office employees in South Carolina. Please indicate whether BellSouth may hire additional central office employees in South Carolina and, if so, how many, and whether these same employees would be involved in the provisioning of collocation arrangements in South Carolina,

18. At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851 -TP, Mr. Heartley indicates that BellSouth may hire as many as 394 installation and maintenance employees in South Carolina. Please indicate whether BellSouth may hire additional installation and maintenance employees in South Carolina and, if so, how many, and

whether these same employees would be involved in the provisioning of Transport to and from CLEC collocation arrangements in South Carolina.

19. At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851 -TP, Mr. Heartley indicates that BellSouth may hire as many as 394 installation and maintenance employees in South Carolina. Please indicate whether BellSouth may hire additional installation and maintenance employees in South Carolina and, if so, how many, and whether these same employees would be involved in the provisioning of EELs in South Carolina.

20. At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 394 installation and maintenance employees in South Carolina. Please indicate whether BellSouth may hire additional installation and maintenance employees in South Carolina and, if so, how many, and whether these same employees would be involved in the provisioning of collocation arrangements in South Carolina.

21. Please indicate when BellSouth intends to begin hiring the employees described above and discuss the extent to which any or all of those employees will be trained on or before December 1, 2004.

22. At page 4 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Milner described EELs and suggests CLECs can utilize BellSouth provided EELs in order to connect end users to CLEC switches. With respect to EELs as described in Mr. Milner's testimony, please provide the following:

a. indicate whether BellSouth's procedures require CLECs to be collocated in more than one central office per LATA in which they purchase EELs;

b. indicate whether BellSouth, when providing EELs, will provide for concentration such that multiple DSO loops (served out of a single wire-center) can be aggregated onto a single DS 1 transport facility;

c. to the extent the answer to (b) above is "yes," please provide all relevant ordering and provisioning manuals, guides and other relevant documentation containing descriptions of the processes and procedures required to purchase such EELs;

d. separately indicate whether — as part of the "individual hot cut," "project hot cut," or "batch hot cut" processes described in Mr. Ainsworth direct testimony - CLECs can convert UNE-P lines to unbundled loops utilizing EEL connectivity in lieu of connecting loops via CLEC collocations arrangements;

e. please indicate the number of DSO loops provided by BellSouth in the state of South Carolina which are connected to transport such that they comprise EELs as described in Mr. Milner's direct testimony;

f. with respect to any such DSO loops identified in response to (e) above, please indicate whether the loop to transport cross connect occurs without the necessity of CLEC collocation in the office where the loops are connected to the transport facilities. To the extent that such cross connects occur without the necessity of CLEC collocation in the wire-center

where such cross connect occurs, please indicate of the total number of DSO loops described in response to (e) are of this variety.

23. Has BellSouth determined in which markets in South Carolina the self-provisioning triggers described by the FCC have been met or in which CLECs otherwise are not impaired without access to unbundled local switching due to the potential for competitive entry. If so, identify each such market, and, with respect to each market, please provide the aggregate number of UNE P lines BellSouth currently provides CLECs. For each such market identify by wire-center the number of such UNE-P lines that are being provided.

24. If BellSouth has identified any markets described in response to Interrogatory 23, please provide the aggregate number of UNE DSO Loops BellSouth currently provides CLECs.

25. If BellSouth has identified any markets described in response to Interrogatory 23, please provide the aggregate number of retail DSO lines BellSouth currently provides its retail customers in these markets.

26. If BellSouth has identified any markets described in response to Interrogatory 23, please provide an Excel Spreadsheet using the information below to create a table to separately identify on a wire center basis for these markets the following:

- a. BellSouth wire-center CLI;
- b. CEA (as the term is used by Dr. Aron and Ms. Tipton in their testimony filed with the Florida Public Service Commission in Docket Number 030851-TP) in which the BellSouth wire-center resides;
- c. rate zone in which the BellSouth wire-center resides;
- d. identify whether the “self provisioning” trigger (discussed in Ms.

Tipton’s testimony in her testimony filed with the Florida Public Service Commission in Docket Number 030851-TP)) or the potential for competitive entry (discussed in Dr. Aron’s testimony) supports BellSouth’s claim that carriers are not impaired in that particular BellSouth wire center;

e. number of retail DSO lines currently provided by BellSouth in the identified BellSouth wire-center;

f. number of UNE-P DSOs provided to CLECs in the identified BellSouth wire-center;

g. number of DSO UNE Loops provided by BellSouth to CLECs in the identified wire center;

h. number of CLECs to whom BellSouth is currently providing UNE loops (without unbundled local switching) in the identified BellSouth wire-center;

i. number of active CLECs to whom BellSouth is currently providing collocation in the identified BellSouth wire-center;

- j. number of CLECs to whom BellSouth is currently providing UNE P (combined UNE Loops and Unbundled Local Switching) in the identified BellSouth wire-center;
- k. number of DSO loops cross connected to transport without collocation (i.e. EELs) provided in the identified BellSouth wire center; and
- 1. number of DSO EELs provided with concentration in the identified wire-center.

REQUEST FOR PRODUCTION OF DOCUMENTS

27. Produce all documents identified in response to each interrogatory in MCI's Second Set of Interrogatories to BellSouth. In producing documents, please identify and group and documents by each individual interrogatory number.

By: _____

January _____, 2004.

Darra W. Cothran
Woodward, Cothran & Herndon
Post Office Box 12399
Columbia, S.C. 29211
Phone (803) 799-9772
Fax (803) 799-3256
dwcothran@wchlawn.com

Kennard B. Woods
MCI
Law and Public Policy
6 Concourse Parkway, Suite 600
Atlanta, GA 30328
Phone (770) 284-5497
Fax (770) 284-5488
ken.woods@mci.com

CERTIFICATE OF SERVICE

PERSONALLY APPEARED before me, Betty J. DeHart, who, being duly sworn, deposes and says that she is not a party to these proceedings and has no interest therein; that on the 5th day of January, 2004, she served by mail the Third Set of Interrogatories and Requests to Produce of MCI WorldCom Communications, Inc., Intermedia Communications, Inc., and MCIMetro Access Transmission Services, LLC in the above entitled case upon all counsel of record by causing same to be deposited in an authorized United States Mail Box; that the envelopes containing said document were properly addressed, securely wrapped and sealed and bore the proper postage; and that said envelopes were addressed to the persons indicated below, and via electronic mail by sending copies of same via electronic mail to the email addresses indicated below.

F. David Butler, Esquire
The Public Service Commission
State of South Carolina
Post Office Drawer 11649
Columbia, S.C. 29211
david.butler@psc.state.sc.us

Elliott Elam, Acting Consumer Advocate
South Carolina Department of Consumer Affairs
Post Office Box 5757
Columbia, S.C. 29250-5757
elam@dca.state.sc.us

Patrick Turner, General Counsel
BellSouth Telecommunications
Post Office Box 752
Columbia, S.C. 29202
patrick.turner@bellsouth.com

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, S.C. 29202
jpringle@ellislawhorne.com

Robert E. Tyson, Jr., Esquire
Sowell, Gray, Stepp & Laffitte, LLC
Post Office Box 11449
Columbia, S.C. 29211
rtyson@sowell.com

Margaret M. Fox, Esquire
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, S.C. 29211
pfox@mcnair.net

Betty J. DeHart

SWORN to before me this

_____ day of January, 2004.

_____(L.S.)
Notary Public for South Carolina
My Commission Expires: _____